



Eitan D. Blanc
Member PA & NJ BAR
Direct Dial-267-765-7341
Fax – 267-765-9689
edblanc@zarwin.com

December 22, 2020

VIA ECF

Hon. Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

**Re: In Re Bath Iron Works v. Congoleum Corporation; U.S. District Court,
District of New Jersey, No. 3-20-cv-16590-MAS**

Dear Judge Shipp:

This letter is submitted, pursuant to Your Honor's judicial preferences, in lieu of a formal motion seeking the Court's permission for Anthony R. Twardowski and Earl M. Forte, III to appear on behalf of DVL, Inc. and DVL Kearny Holdings *pro hac vice*. Enclosed are proposed forms of order and certifications in support of the applications for *Pro Hac Vice*. Counsel for Bath Iron Works Corporation and Congoleum Corporation have consented to their *pro hac vice* admission. We respectfully request your honor enter the enclosed orders.

We appreciate Your Honor's attention to this matter. Please do not hesitate to contact me with any questions.

Respectfully,

/s/ Eitan D. Blanc
Eitan D. Blanc

EDB
Enclosures
CC: All counsel of record (via ECF)